

EXHIBIT C

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8

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 IN RE: CATHODE RAY TUBE (CRT))	Case No.: 3:07-CV-5944
13 ANTITRUST LITIGATION)	MDL NO. 1917 – ALL CASES
14)	INITIAL DISCLOSURE
15 This document relates to:)	STATEMENT OF BEIJING
16 ALL ACTIONS)	MATSUSHITA COLOR CRT CO.,
17)	LTD.
)	(Fed. R. Civ. P. 26(a)(1))
)	Before the Honorable Samuel Conti

18 Defendant Beijing Matsushita Color CRT Co., Ltd. ("BMCC") hereby submits its initial
19 disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1).

20 The fact that BMCC makes these initial disclosures does not constitute a waiver of
21 BMCC's right to assert the defense of lack of personal jurisdiction. The disclosures and
22 descriptions contained herein do not constitute a waiver of BMCC's objections to the production
23 or discoverability of any information disclosed herein. BMCC expressly reserves all objections
24 and reserves the right to retract any inadvertent disclosures of documents or information that are
25 protected by the attorney-client privilege, the work-product doctrine, or any other applicable
26 protection or privilege.

1 BMCC makes these initial disclosures based on the information currently known to it.
2 BMCC continues to investigate the allegations and will amend, revise or supplement this
3 disclosure if additional facts, witnesses, or other information so warrants pursuant to Federal
4 Rule of Civil Procedure 26(e).

5 As of the time of these disclosures, Plaintiffs have yet to file an amended consolidated
6 complaint. BMCC reserves the right to amend, modify, clarify, or supplement the information
7 contained in these initial disclosures to address the allegations in the amended consolidated
8 complaint once filed. BMCC is in the process of assessing issues relevant to the case and
9 anticipates bringing a motion to dismiss when appropriate. BMCC also reserves the right to
10 supplement these initial disclosures through discovery responses.

11 BMCC reserves the right to continue its investigation and discovery of witnesses,
12 documents, and facts which may be relevant to this case. BMCC reserves the right at the time of
13 trial to produce, refer to and offer into evidence any additional documents, facts, and evidence
14 from any source and testimony from any witness which may be revealed through its continuing
15 investigation, discovery, and trial preparation, notwithstanding the reference to documents and
16 information in these initial disclosures.

17 **I. Disclosure of Individuals**

18 BMCC believes that the following individual is likely to have potentially discoverable,
19 non-expert information that BMCC may use to support its defenses in this action. BMCC
20 reserves the right to call as witnesses, or rely upon information from, other individuals whose
21 identities may become known during the progression of the action, and to rely upon information
22 from other sources for purposes of impeachment. BMCC also expressly reserves the right to
23 amend, modify, clarify, or supplement this disclosure after Plaintiffs file an amended
24 consolidated complaint. The following individual may only be contacted through the
25 undersigned counsel:

26 Mr. Toshiyuki Hamada.
27
28

1 This individual is likely to possess knowledge and information relating to BMCC's
2 cathode ray tube ("CRT") business, including marketing, pricing, sales and distribution.

3 BMCC also identifies as likely to have discoverable, non-expert information that BMCC
4 may use to support its defenses in this action, one or more representatives of the defendants
5 named herein to be contacted through their counsel of record concerning any involvement of
6 BMCC in the conspiracy alleged in the CRT complaint served on BMCC to date.

7 **II. Disclosure of Information**

8 Relevant documents, electronically stored information, and tangible things that BMCC
9 may use to support its defenses in this action may be located at:

10 Beijing Matsushita Color CRT Company Ltd.
11 9 Jiuxianqiao N Road
12 Dashanzi
13 Beijing
14 China

15 or

16 Panasonic Company Information System Centre
17 9th Floor, HSBC Tower, 1000 Lujiazui Ring Road
18 Pudong New Area
19 Shanghai
20 China

21 These documents or electronically stored information may relate to the market for CRTs, sales of
22 CRTs, CRT customers, and CRT production. BMCC reserves the right to amend, modify,
23 clarify, or supplement this list after Plaintiffs file their amended consolidated complaint. BMCC
24 reserves the right to rely upon additional documents and information that may be discovered
25 during the course of this action, and for the purposes of impeachment.

26 **III. Damages**

27 Not applicable.

28 **IV. Insurance**

BMCC is not aware of any insurance agreement under which an insurer may be liable to
satisfy part or all of a judgment in this action or to reinsure for payments made to satisfy a
judgment or any portion of a judgment.

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3 Dated: October 15, 2008

FRESHFIELDS BRUCKHAUS
DERINGER US LLP

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CERTIFICATE OF SERVICE

I, Kate S. McMillan, declare that I am over the age of eighteen (18) and not a party to the within action. I am an associate at the law firm of Freshfields Bruckhaus Deringer US LLP, 701 Pennsylvania Avenue, NW, Suite 600, Washington, DC 20004. On October 15, 2008, I served the within document, **INITIAL DISCLOSURE STATEMENT OF BEIJING MATSUSHITA COLOR CRT CO.**, via electronic transmission to the email addresses shown below:

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6 Dated: October 15, 2008

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